

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

ASSOCIATED RECOVERY, LLC,

Plaintiff,

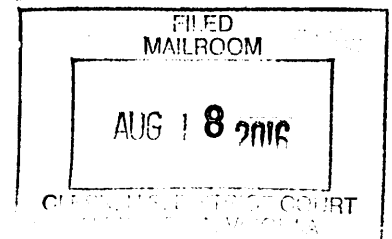
v.

JOHN DOES 1-44,

Defendants in rem.

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Case No. 1:15-cv-01723-AJT-JFA



DEFENDANT'S MOTION TO SET ASIDE DEFAULT
JUDGMENT RE FXF.COM

Ye Yu, erroneously sued as John Doe (re domain FXF.com, section 10 of the complaint), pursuant to Federal Rule of Civil Procedure 60(b), hereby request to set aside the Default Judgment entered on May 18, 2016 (ECF 43).

Pursuant to Local Civil Rule 7(E), Ye Yu contacted Plaintiff's counsel in good faith to discuss the ground to this motion and requested that the default judgment be set aside.

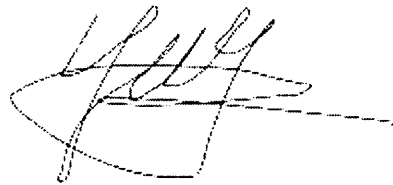
The basis for this motion is set forth more fully in the accompanying Memorandum in Support of Motion to Set Aside the Default Judgment.

WHEREFORE, Defendant respectfully requests that the Court grant this Motion and set aside the Judgment entered on May 18, 2016, 2016 (ECF 43) and order Uniregistrar Corp., the current registrar of the FXF.com domain name, in coordination with Verisign Inc., the registry of all ".com" domains, to take all steps within their power to transfer the domain back to Ye Yu at its original registrar.

Defendant further requests that this case is transferred to United States District Court for the Northern District of Texas.

Dated: August 16, 2016

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Ye Yu', with a horizontal line extending to the right.

Ye Yu
5001 Wilshire Blvd, #112-528
Los Angeles, CA 90036
Phone: 818-919-5619
Email: info@yespire.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing Defendant's

- Motion to Set Aside Default Judgement Regarding FXF.com
- Memorandum of Points and Authorities In Support of Motion, and accompanying Exhibit-1, Exhibit-2, Exhibit-3
- Declaration by Ye Yu
- Notice of Hearing
- Proposed Order

Were mailed this 16th Day of August, to the Plaintiff's counsel Rebecca J Stempien Coyle at:

Rebecca J Stempien Coyle (VSB-17483)
Levy & Grandinetti
1120 Connecticut Avenue, N.W., Suite 304
Washington, D.C. 20036
Phone (202) 429-4560
Fax (202) 429-4564
mail@levygrandinetti.com

By placing a copy in a separate envelope, with postage fully prepaid, for each address named below postage paid as priority mail express.

Dated: August 16, 2016

A handwritten signature in black ink, consisting of several loops and a final horizontal stroke, representing the name Evgeny Swarovski.

Evgeny Swarovski
PO Box 81
Pasadena, CA 91102

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ASSOCIATED RECOVERY, LLC,)

)

Plaintiff,)

)

v.)

Case No. 1:15-cv-01723-AJT-JFA

)

JOHN DOES 1-44,)

)

Defendants in rem.)

CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of this document.

Ye Yu

Name of Pro Se Party



Signature of Pro Se Party

Executed on: August 16, 2016

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ASSOCIATED RECOVERY, LLC,)	
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<i>Plaintiff,</i>)	
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v.)	Case No. 1:15-cv-01723-AJT-JFA
)	
JOHN DOES 1-44,)	
)	
<i>Defendants in rem.</i>)	

[PROPOSED] ORDER TO SET ASIDE DEFAULT JUDGEMENT

UPON CONSIDERATION of defendant's Motion to Set Aside Default
Judgement Regarding FXF.com, and the record before the Court, it is HEREBY:

ORDERED that the Defendant's Motion to Set Aside Default Judgement
Regarding FXF.com is GRANTED; and

IT IS FURTHER ORDERED that Verisign, Inc., which is located in this
District, is DIRECTED to change the registrar of record for domain FXF.com to
transfer the ownership and control to defendant Ye Yu; and

IT IS FURTHER ORDERED that the case be transferred to Northern
District of Texas for subsequent proceedings.

SO ORDERED this ____ day of _____, 2016

Hon